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*Attorneys for Receiver, Maria E. Windham*

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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MARIA E. WINDHAM, as Receiver for  
MARQUIS PROPERTIES, LLC,

Plaintiff,

v.

JEFFREY PAUL SNYDER, an individual; JP  
SNYDER, INC., a Florida Corporation;  
JUDITH SNYDER, an individual; JOSEPH  
L. SIMONDS, an individual; ANNUITY  
THINK TANK, LLC, an expired Texas  
limited liability company; SIMONDS  
HOLDINGS, LLC, a dissolved Texas limited  
liability company; and JOHN DOES 1-5,

Defendants.

**RECEIVER’S MOTION TO DISMISS  
REMAINING CLAIMS**

Case No. 2:18cv63-RJS-DAO

District Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

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Plaintiff Maria E. Windham, as Receiver for Marquis Properties, LLC (the “Receiver”),  
by and through counsel, hereby requests this Court dismiss all her remaining claims against the  
remaining defendants in this lawsuit based on an order of the Court in the receivership case,  
*Securities and Exchange Commission v. Marquis Properties, LLC, et al.*, Case No. 2:16-cv-  
00040-JNP.

In the receivership case, the Receiver filed a motion under seal in which she sought permission from the court to dismiss all remaining litigation based on the Receiver's analysis comparing the accruing costs of litigation to potential benefits to the receivership estate of continuing to pursue the remaining lawsuits. On February 4, 2021, the Court issued an order granting the Receiver's Sealed Motion to Dismiss Lawsuits. (*SEC v. Marquis Properties, LLC*, 2:16-cv-00040-JNP, Dkt. No. 341).

Based on the foregoing, the Receiver respectfully requests the Court enter an order granting her Motion to Dismiss Remaining Claims and dismiss all remaining claims against all remaining Defendants, with prejudice, each party to bear its own costs. A proposed Order is submitted herewith.

DATED this 5<sup>th</sup> day of February, 2021.

RAY QUINNEY & NEBEKER P.C.

/s/ Jascha K. Clark

Kristine M. Larsen

Jascha K. Clark

*Attorneys for Receiver, Maria E. Windham*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of February, 2021, I filed a true and correct copy of the above **RECEIVER'S MOTION TO DISMISS REMAINING CLAIMS** with the Clerk of the Court via the Court's CM/ECF system, which sent notification to the following:

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/s/ Ashley Rollins